


U.S. Department of Justice
*United States Attorney
Eastern District of New York*

 AFM/EHS/AA
F. #2022R00315

 271 Cadman Plaza East
Brooklyn, New York 11201

February 22, 2024

By ECF and FedEx

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Re: United States v. Sagar Singh, et al.
Criminal Docket No. 23-236 (FB)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The discovery supplements the government's productions on August 18, 2023, September 20, 2023, and October 27, 2023. The government also requests reciprocal discovery from the defendant. In addition, the government has marked certain records as Sensitive Discovery Material, consistent with the Stipulation and Protective Order entered into on July 24, 2023. See ECF No. 28.

I. The Government's Discovery

Bates Numbers	Description
VILE_0000000377	Records from an iPhone belonging to a co-conspirator. This has been produced to both defendants and is marked as SENSITIVE DISCOVERY.
VILE_0000000378	Extraction of a Western Digital 2TB hard drive belonging to Sagar Singh (Serial No. WCC4M5CNDE1). This has been produced only to Sagar Singh.

VILE_0000000379	Extraction of a Dell desktop computer belonging to Sagar Singh (Serial No. 7DXDCS2). This has been produced only to Sagar Singh.
VILE_0000000380	Extraction of an Asus laptop belonging to Nicholas Ceraolo (Serial No. H2N0CY004554065). This has been produced to both defendants.
VILE_0000000381	Records from an Apple iPhone 8 Plus belonging to Nicholas Ceraolo. This has been produced to both defendants and is marked SENSITIVE DISCOVERY.
VILE_0000000382	Records from Discord user "VIXENBUNNY#6437." This has been produced to both defendants and is marked SENSITIVE DISCOVERY.
VILE_0000000383	Records from Google User AGSUMNER06@GMAIL.COM. This has been produced to both defendants and is marked SENSITIVE DISCOVERY.
VILE_0000000384	Consent forms and social media account records associated with Sagar Singh. This has been produced to both defendants and is marked SENSITIVE DISCOVERY
VILE_0000000385	Consent forms and social media account records associated with Nicholas Ceraolo. This has been produced to both defendants and is marked SENSITIVE DISCOVERY

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Adam Amir
Adam Amir
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Enclosures

cc: Clerk of the Court (FB) (by ECF) (without enclosures)